<u>Remarks</u>

These Remarks are in reply to the Office Action mailed September 4, 2008.

I.   <u>Summary of Examiner's Rejections</u>

Prior to the Office Action mailed September 4, 2008, Claims 1-2, 4-7, 18, 20, 22-25, 34-38, 40, 42-45, 54-58, 60, and 62-65 were pending in the Application. In the Office Action, Claims 1-2, 4, 6-7, 18, 20, 22, 24-25, 34-38, 40, 42, 44-45, 54-58, 60, 62, and 64-65 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Park et al. (U.S. Patent Publication No. 2004/0024812, hereafter Park) in view of Beach et al. (U.S. Patent No. 6,728,713, hereafter Beach), in view of Berger et al. (U.S. Patent Publication No. 2004/0093344 A1, hereafter Berger), and further in view of Rupert et al. (U.S. Patent No. 6,366,915, hereafter Rupert). Claims 5, 23, 43, and 63 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Park, in view of Beach, in view of Berger, in view of Rupert, and in further view of Official Notice.

II.   <u>Discussion of the Claims</u>

Claim 1

Claim 1 requires a first group of services for integrating a plurality of content repositories into virtual content repositories, such that the plurality of content repositories appear and behave as a single content repository.

In the Office Action, Park was cited as disclosing the above feature because Park discloses a dynamic search/comparison service that provides an integrated search service for integrating data from various data sources and allowing for search based on search conditions (paragraph [0035]). However, although Park discusses that the search service is used "for integrating data from various sources and allowing for search," Park does not disclose any virtual content repositories, nor does Park disclose integrating a plurality of repositories into virtual content repositories, as required by Claim 1. Instead, Park merely discloses a search service that can search for data from various data sources.

Thus, while Park uses discloses a search service that can "integrate" data from various data sources, Park does not disclose integrating a plurality of content repositories into *virtual*

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content repositories such that the plurality of content repositories appear and behave as a single repository, as required by Claim 1.

Claim 1 also requires a first group of services that include second functions for incorporating combined content of the plurality of content repositories into a hierarchical namespace.

In the Office Action, Beach was cited as disclosing the above feature. Beach discloses a central database resident on a server that contains database objects (Abstract). A database object maintains a list of object IDs and an associated simple name for the object (column 6, lines 7-8). Directory objects may include other directory objects as part of the list, and there is a single distinguished object called the "root" directory (column 6, lines 8-11). The sequence of directory objects traversed, starting at the root directory and continuing until the object of interest is found, is called a "path" to the object, the path indicating a particular location within the hierarchical namespace created among all directory objects present in the database (column 6, lines 11-16). In other words, Beach incorporates contents of only a single content repository into a hierarchical namespace.

In contrast, Claim 1 requires second functions for incorporating *combined content of the plurality of content repositories* into a hierarchical namespace. Thus, because Beach discloses that a hierarchical namespace is created amongst all of the directory objects in a single database, but does not disclose creating a hierarchical namespace amongst a plurality of content repositories, Beach does not disclose second functions for incorporating combined content of the plurality of content repositories into a hierarchical namespace, as required by Claim 1.

In the Response to Arguments section of the Office Action, it was submitted that one cannot show nonobviousness by attacking references individually where the rejections are based on a combination of references. The Office Action first notes that Beach indeed discloses a method for creating a hierarchical namespace amongst all of the directory objects of a central database. The Office Action also notes that Park discloses a method for integrating data from various sources. Thus, the Office Action concludes that it would have been obvious to one of ordinary skill in the art to combine Beach and Park "to have an invention wherein databases from various data sources are combined and integrated. The integrate data may be then used in

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the creation of a hierarchical namespace which incorporates the integrated data from a plurality of content repositories." Applicants respectfully disagree, as explained below.

Park accomplishes the searching for data across multiple data sources by extracting relevant data from the data sources, storing that data as containers in a single internal repository, and fetching those containers of data by the search service in order to present the search results to a requesting user (paragraph [0014]). However, there does not appear to be any teaching, suggestion, or motivation to combine the teachings of Park and Beach in order to integrate combined content of multiple data sources into a hierarchical namespace because an integration does not appear to improve Park's integrated search service in any way. With or without the integration into a hierarchical namespace, Park's search service would still extract data from each individual data source and store that data as containers of data in the internal repository. Furthermore, since Park discloses that the internal repository has its own hierarchy of directories in which to store the extracted data that is distinct from any hierarchy of the various data sources, creating a separate hierarchical namespace to integrate the various data sources would only add increased complexity to the system disclosed in Park without adding any additional benefits because the internal repository would still have its own separate hierarchy of directories apart from a hierarchical namespace and would still have to give its own internal path to all extracted data that is stored in the internal repository (figure 8, paragraph [0027]). For at least the above reasons, there would be no motivation to combine Park and Beach.

Furthermore, even if, for argument's sake, Park and Beach were combinable, Park and Beach, in combination, would still not teach a first group of services that include second functions for incorporating combined content of the plurality of content repositories into a hierarchical namespace, as explained below.

Park teaches publishing data that is stored in various data sources by extracting content from those data sources into a single internal repository and processing the extracted data stored in the internal repository (paragraph [0027]) while Beach teaches creating a database namespace from a single database (Abstract). Even if Park and Beach were combined so that the teachings of Beach were applied to Park, the combination of Beach and Park, at best, would still only teach either the creation of a namespace for the internal repository in Park or the creation of a separate namespace for each of the individual data sources disclosed in Park because Beach teaches only

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how to create a namespace for a single database. However, the combination of Park and Beach would still not teach second functions for incorporating combined content of the plurality of content repositories into a hierarchical namespace.

In addition, even though Park discloses an integrated search service that "integrates" data from the multiple data sources, Park only teaches that the integration includes extraction of data from the data sources into a single internal repository in order to be presented (paragraph [0035]). However, such integration of data via the extraction of that data from data sources still does not appear to be relevant in any way in showing how to extend the teachings of Beach in order to integrate multiple data sources into a hierarchical namespace.

Thus, because integrating combined content of multiple data sources into a hierarchical namespace would add additional complexity without any corresponding benefits, and because the "integrating" disclosed in Park does not show how to extend the teachings of Beach in order to integrate multiple sources into a hierarchical namespace, Beach and Park, even if combined, do not make obvious second functions for incorporating combined content of the plurality of content repositories into a hierarchical namespace, as required by Claim 1.

In view of the comments provided above, Applicants respectfully submit that the embodiment defined by Claim 1 is not obvious in view of the cited references, and reconsideration thereof is respectfully requested.

Claims 18, 34, and 54

For similar reasons as provided above with respect to Claim 1, Applicants respectfully submit that Claims 18, 34, and 54 are likewise neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested.

Claims 2, 4-16, 20, 22-33, 35-38, 40, 42-53, 55-58, 60, and 62-65

Claims 2, 4-16, 20, 22-33, 35-38, 40, 42-53, 55-58, 60, and 62-65 are not addressed separately, but it is respectfully submitted that these claims are allowable as depending from an allowable independent claim and further in view of the features that they provide. Applicants respectfully submit that these Claims are similarly neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested.

III. Conclusion

In view of the above amendments and remarks, it is respectfully submitted that all of the claims now pending in the subject patent application should be allowable, and reconsideration thereof is respectfully requested. The Examiner is respectfully requested to telephone the undersigned if he can assist in any way in expediting issuance of a patent.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this reply, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: <u>November 4, 2008</u>   By: <u>   /Guanyao Cheng/   </u>
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